

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA, HARRISBURG DIVISION**

IN RE:	:	
MATTHEW & AIMEE SULLIVAN	:	
And		
RONALD C. SMITH	:	
CO-DEBTOR	:	Case No : 1-17-00670-RNO
ALLY FINANCIAL INC.	:	
Movant	:	Chapter 13
Vs.	:	
MATTEW & AIMEE SULLIVAN		
CHARLES J. DEHART, III TRUSTEE,	:	
Respondent	:	

ANSWER TO MOTION FOR RELIEF OF THE AUTOMATIC STAY

AND NOW, comes Respondents, Matthew & Aimee Sullivan, by and through their attorney, Gregory S. Hazlett, Esquire, and answers this Motion for Relief from Automatic Stay:

1. ADMITTED:

2. ADMITTED:

3. ADMITTED:

4. ADMITTED:

5. ADMITTED:

6. DENIED: As of this response the debtors have tendered all of the requisite arrearages due owing and payable to the movant.
7. ADMITTED:
8. DENIED: The debtors at all times from the date of the purchase heretofore have and continue to have automobile coverage on the subject vehicle.
9. DENIED: Counsel for the movant is unable to verify the amount of counsel fees relative to this motion on an itemized basis which would include hours billed and billable hourly rate.
10. ADMITTED:
11. DENIED: As of the date of this response the debtors have tendered via U.S. mail the arrears owing to the movant in its entirety and as such are current relative to their automobile loan.

WHEREFORE, the debtors respectfully requests that the Honorable Court

- A. Deny the movant's Motion for Relief from the Automatic Stay for the aforementioned reasons.
- B. Deny Ally consent to take other actions relative to recovering the collateral.
- C. Deny the request to terminate the stay under 11 USC 1301 (c).
- D. Denying any other relief.

7/18/2017

Respectfully submitted,

s/s Gregory S. Hazlett, Esquire
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